

STATE OF IOWA
DEPARTMENT OF COMMERCE
UTILITIES BOARD

IN RE: AREA CODE 515 RELIEF PLAN	DOCKET NO. SPU-99-22
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**ORDER APPROVING GEOGRAPHIC SPLIT TO PROVIDE
NUMBERING PLAN RELIEF FOR THE 515 AREA CODE**

(Issued February 24, 2000)

INTRODUCTION

On July 23, 1999, the North American Numbering Plan Administrator (NANPA) filed with the Iowa Utilities Board (Board) a recommendation for area code number exhaustion relief for the 515 area code. (Tr. 15¹). The recommendation was filed on behalf of the Iowa telecommunications industry in the affected area. At that time, NANPA projected the 515 area code would run out of central office codes during the second quarter of 2001. (Id.). The industry recommended the Board adopt a new overlay area code on the entire 515 area code to provide additional central office codes. (Id.).

NANPA filed the recommendation with the Board pursuant to 47 C.F.R. § 52.19(a) (1999), which delegates responsibility to the Board to determine the most appropriate form of relief when an Iowa area code is near exhaustion. Any Board action must be consistent with the applicable federal guidelines.

¹ The reference is to page 15 of the transcript of the hearing held in this docket on December 14, 1999.

JURISDICTION

The Federal Communications Act of 1934, as amended by the Telecommunications Act of 1996, gives the FCC plenary jurisdiction over numbering issues in the United States. 47 U.S.C. § 251(e)(1). The statute permits the FCC to delegate all or a portion of its jurisdiction to state public utility regulatory bodies such as the Board.

The FCC exercised its authority to delegate to state agencies when it adopted 47 C.F.R. § 52.19(a), which provides:

State commissions may resolve matters involving the introduction of new area codes within their states. Such matters include, but are not limited to: Directing whether area code relief will take the form of a geographic split, an overlay area code, or a boundary realignment; establishing new area code boundaries; establishing necessary dates for the implementation of area code relief plans; and directing public education and notification efforts regarding area code changes.

Any state action pursuant to this delegated authority must be "consistent with the guidelines enumerated in this part." See 47 C.F.R. § 52.19(b). Those guidelines include 47 C.F.R. § 52.9(a), which requires that the state agency's decision must "facilitate entry into the telecommunications marketplace" by making numbers available "on an efficient, timely basis;" must "not unduly favor or disfavor any particular telecommunications industry segment or group of telecommunications consumers;" and must "not unduly favor one telecommunications technology over another."

The Board is the state agency that regulates the rates and services of public utilities in Iowa, including telecommunications utilities. Iowa Code § 476.1 (1999). Relevant state standards that guide the Board in this matter include Iowa Code § 476.8, which requires that utilities furnish reasonably adequate service and facilities; Iowa Code § 476.95(1), expressing the state policy that communications services should be available throughout the state at just, reasonable, and affordable rates from a variety of providers; and Iowa Code § 476.95(2), providing that the Board must act to further the development of competition in its regulation of telecommunications companies.

This docket presents mixed questions of legislative and judicial facts. For example, the choice between a split and an overlay appears to be a blend of policy and fact issues, while the details of implementing either form of relief may be more technical than fact-specific. Accordingly, the Board used a mixture of public comment meetings and formal hearing proceedings in this docket, reflecting the nature of the issues.

The Board emphasizes that its decision is amply supported by the evidentiary record assembled at the December 14, 1999, hearing in this docket. Further, this decision is consistent with the public opinion expressed at a series of seven public education and comment meetings and in the numerous written comments received from the general public.

PROCEDURAL HISTORY

As a part of its number administration duties, NANPA prepares a periodic report, known as a Central Office Code Utilization Survey (COCUS), to forecast the remaining life of area codes in the United States. (Tr. 14). Based upon the 1999 COCUS, NANPA estimated that the supply of central office codes in the 515 area code would exhaust in the second quarter of 2001. Following its standard procedures, NANPA invited the Iowa telecommunications industry in the 515 area code to a meeting on June 17, 1999, at which the industry reached consensus to recommend an all services distributed overlay for 515 area code. (Tr. 14-15). NANPA then filed with the Board the petition that initiated this docket.

On October 1, 1999, the Board issued an order docketing NANPA's petition as Docket No. SPU-99-22 and establishing a procedural schedule. Pursuant to that schedule, the Board held four public information and comment hearings in Mason City, Fort Dodge, Osceola, and Des Moines. The Board also established a schedule for written comments and a formal hearing at which interested persons could submit sworn testimony regarding the issues in this docket.

At the October 28, 1999, public information and comment meeting in Des Moines, several people suggested the Board consider a three-way split, with two new area codes, as a means of increasing the projected life of the resulting relief. Board staff contacted NANPA and requested a proposed three-way split for Board consideration. The Board then issued an order on November 5, 1999, taking official notice of the new alternative and scheduling three additional public information and

comment meetings, in Ames, Marshalltown, and Des Moines. Those three cities would be the largest population centers in each of the three proposed new area codes. At the same time, the Board asked that all persons submitting formal written comments in this docket and participating in the December 14, 1999, hearing include comments regarding the three-way split, the two-way splits, and the overlay alternative.

Formal written comments or reply comments were filed by NANPA, U S WEST Communications, Inc. (U S West), GTE Midwest Incorporated (GTE), AT&T Communications of the Midwest, Inc. (AT&T), the Iowa Telecommunications Association (ITA), and the Consumer Advocate Division of the Department of Justice (Consumer Advocate).

The formal hearing was held on December 14, 1999, at which time representatives of NANPA, U S West, and Consumer Advocate testified regarding their respective proposals for area code relief in the 515 area code. Briefs and reply briefs were subsequently filed by the interested parties.

ANALYSIS

1. The Major Alternatives

During the public meetings and the formal hearing in this docket, at least four specific relief options were discussed:

- Alternative A (also described in the testimony as "Option 4") – an east-west split (the dividing line would run generally north and south). (Tr. 27).
 - (1) This option keeps Ames and Des Moines in the same area code

- (2) It splits 14 U S West local calling areas (EAS routes) (Note: U S West was the only company to provide information regarding the number of local calling areas split by each option)
- Alternative B (also described in the testimony as "Option 3") – a north-south split, with the dividing line running roughly east and west. (Tr. 26).
 - (1) This option separates Ames and Des Moines into separate area codes
 - (2) It splits 6 U S West local calling areas
- Alternative C ("Option 5") – a 3-way split, with Des Moines and the surrounding area as one area code, the area south and east of Des Moines as a second area code, and the area north of Des Moines as the third area code
 - (1) This option also separates Ames and Des Moines
 - (2) It splits 8 U S West local calling areas
- The overlay alternative – a fully-distributed geographic overlay that would exactly match the outlines of the existing 515 area code. +Tr. 24).

Other options are also a part of the record in this proceeding, but for one reason or another do not merit consideration in this order. For example, one alternative analyzed by NANPA would have split the area code with a rough circle around Des Moines (Tr. 25). While this was a logical alternative for NANPA to test, it must be rejected because the projected relief lives are seriously imbalanced (3.6 years for Area A and 17.4 years for Area B) and therefore may violate industry guidelines for area code relief. (Tr. 64, 83-84). In any event, the 3.6 year-projected life for one part of that split is too short to merit further consideration. (Tr. 111). After eliminating alternatives that had no merit, the alternatives described above are the

options that received the most attention from the public and the telecommunications industry and are the ones the Board considers the most realistic alternatives.

Each type of plan (split or overlay) has inherent advantages and disadvantages, some of which are listed below:

Geographic split

Pros:

- Preserves 7-digit local dialing in most situations²
- Preserves geographic association with area codes
- Customers will not have different area codes in the same home or office
- All carriers are treated similarly
- Industry has extensive experience with splits
- May permit a shorter permissive dialing period

Cons:

- Requires about ½ (or 2/3, for a 3-way split) of all customers to change area codes, requiring changes to advertising, stationary, and notice to family, customers, and other regular callers
- May require re-programming of many mobile phones
- Boundary drawing can be difficult

Overlay

Pros:

- All existing customers retain 515 area code for current lines, minimizing costs to customers and carriers
- If projected relief lives with a split prove over-optimistic, then subsequent splits can “splinter” a territory to an objectionable degree

² Ten-digit dialing would be required for local calls in EAS areas that cross the area code boundary, but they would continue to be local calls.

Cons:

- Requires 10-digit dialing for all local calls within the overlay area
- May require re-programming of many mobile phones and automatic dialers
- Not as competitively neutral as a split, since ILECs typically have large inventories of unused numbers in the old (515) area code
- Existing advertising and directories with 7-digit numbers must be revised to include the area code

(Tr. 108-112).

2. Selection of Alternative A

Based on a consideration of these factors and the information provided to the Board in this docket, the Board finds that a two-way split, identified as Alternative A, is the best available solution for area code relief in the 515 area code. (A map showing Alternative A is attached to this order as Attachment A). The testimony at the formal hearing in this matter supports use of a split; the Board is particularly persuaded by the testimony of Consumer Advocate witness Susan Baldwin, who testified that a geographic split would best serve the public interest. (Tr. 106). Ms. Baldwin testified that the overlay should be rejected in this proceeding because the disadvantages outweigh the potential advantages. An overlay would not be competitively neutral (because incumbent carriers would have disproportionate access to the 515 area code) and would force customers to dial ten digits, rather than seven, for all local calls. (Tr. 111). At the same time, Consumer Advocate argues some of the potential advantages of an overlay may not apply to the 515 area code. For example, overlays are useful to prevent area code splintering, but

Consumer Advocate does not see splintering as a significant likelihood for this area code. (Tr. 109-113).

In addition, it was apparent from the public comments received in this docket (both oral and written) that a majority of those commenting were opposed to an overlay. The main reason appeared to be the requirement of 10-digit dialing for all local calls, but various other concerns were also raised. Many also expressed concern that an overlay would reduce the existing geographic association between a community and its area code. (Tr. 108). Further, some customers expressed concern with possible confusion regarding Extended Area Service, or EAS. This service expands a local calling area to reach multiple exchanges that have a community of interest, replacing toll calls within the EAS area with flat-rated service. Because the overlay would require dialing the area code to make EAS calls (and all other local calls), there would be less distinction between the dialing of a toll call and an EAS call, potentially resulting in customer confusion³.

The Board also considers the potential impact of a split or an overlay on carriers. Whichever form of relief the Board chooses, carriers will need to modify their switching equipment in order to recognize the new area code. U S West submitted comments that the cost of implementing a split would be higher than the costs associated with an overlay. (Tr. 311). The cost of customer education was estimated to be about the same with any alternative (Tr. 379), but the cost of network

³ The same situation can occur on a limited basis with a split, but the extent of the problem will be limited to only those EAS areas that are divided by the new area code boundary line; all other EAS areas will be unaffected by the split.

and systems changes is expected to be higher for a split than an overlay. Otherwise, this record does not identify any significant differences between the split and overlay with respect to carrier impacts.

While the split vs. overlay cost differences identified by U S West are significant, they are offset by the higher societal costs associated with an overlay. (Tr. 105, 206). This record does not permit a specific quantification of all of the costs associated with either option, but it is beyond dispute, based upon the public comment in this docket, that the public perceives a high cost associated with ten-digit dialing for local calls, which is a requirement primarily associated with an overlay. The Board finds these societal costs are an appropriate consideration in this docket, even if they have not been (and probably cannot be) reduced to specific dollar figures. The costs of different dialing patterns are no less real simply because they are not capable of easy quantification.

Another factor the Board considers is the projected life of the relief for each of the alternatives. The overlay option and the two-way split options are all projected to provide approximately eight to nine years of area code relief, while the three-way split has a projected life of 15 to 20 years. This appears to be an advantage to the three-way split, but that appearance may be misleading. All of these projections are based on NANPA's existing methodology, which does not consider any impact of possible number conservation measures. (Tr. 87-89). Thus, if the Board is able to successfully implement number conservation measures, the life of the overlay or

two-way split options will be extended beyond the eight- to nine-year projection. (Tr. 33, 128).

Of course, those measures would also extend the projected life of the three-way split, but that projection may be an illusion. The NANPA representatives testified that there is a concern that the entire North American Numbering Plan may exhaust in the next 8 to 12 years, meaning the system would run out of three-digit area codes. (Tr. 32). If this occurs, then the entire telecommunications system might have to be redesigned to use different dialing patterns, possibly including a nationwide increase in the number of digits required to dial local calls. If this happens, the most significant benefit of a three-way split (preserving seven-digit dialing for local calls for a longer period of time) would be lost. In other words, choosing a three-way split solely in order to extend the projected life of relief may amount to relying on a benefit that will never materialize, because intervening changes in the overall network may override those benefits.

3. The Other Alternatives

A. Alternative C, The Three-Way Split

The three-way split has some unique disadvantages, compared to the other options. It would require the assignment of two new area codes to Iowa for 515 area code relief, rather than one, accelerating the potential exhaustion of the nationwide supply of usable area codes. (Tr. 32, 210). Moreover, it would require that approximately two-thirds of the existing customers in the 515 area code change to a different area code, more than the number of customers required to change area

codes in a two-way split (about one-half) or in an overlay (essentially zero). (Tr. 210). A three-way split would further complicate future efforts to consolidate rate centers, which may be an important part of the Board's number conservation measures. (Tr. 198-200, 210).

The Board finds that the possibility of achieving longer relief life with a three-way split is outweighed by the costs associated with this option. This is particularly true when, as described above, the projected life of the three-way split may actually exceed the life of the North American Numbering Plan and the projected lives of the two-way split alternatives may understate the relief that can be achieved through reasonable number conservation measures.

B. The Overlay Option

The telecommunications industry in Iowa recommended an all services distributed overlay for the 515 area code. (Tr. 15). Consumer Advocate, in contrast, recommended a geographic split. (Tr. 106). The commenting public expressed general disfavor for ten-digit dialing for local calls, a mandatory feature of an overlay.

In this record, the industry's support for the overlay alternative is essentially limited to the comments and testimony of U S West. The ITA filed brief comments expressing general support for the industry recommendation, but provided no explanation for its position. GTE filed reply comments in response to the questions asked in the Board's order of November 5, 1999, but otherwise did not provide support for the industry recommendation. AT&T filed comments in support of an overlay, but only if certain qualifications and requirements are satisfied first.

(Tr. 278.) There is no showing that all, or even most, of the incumbent local exchange carriers in the 515 area code are currently able to meet all of AT&T's conditions (Tr. 383), so it is impossible for the Board to conclude, based on this record, that AT&T actually supports use of an overlay for the 515 area code. Thus, U S West was left as the principal industry supporter of the industry's recommendation.

Overlays have many advantages and disadvantages. Of primary concern to the Board, however, is the fact that an overlay is not competitively neutral. In an overlay situation, most (if not all) new entrants in the market will be assigned numbers out of the new area code, while the incumbent local exchange carriers will still have a substantial pool of more desirable 515 telephone numbers.

(Tr. 269-70, 278-79). This would provide the incumbents with a marketing advantage, particularly with existing customers who already have a 515 telephone number and who choose to add one or more new lines after the overlay is implemented. In that situation, only the incumbent local exchange carrier would be able to offer the customer new lines with 515 telephone numbers, a clear marketing advantage. Even with new customers, the 515 area code may be preferable to some customers for some time into the future, as it would tend to give the appearance of an older, more established business. If an overlay is implemented, there is no way the Board can neutralize this built-in advantage for the established carriers. The Board finds this to be a significant disadvantage of the overlay alternative.

Further, the Board is mindful of the public input in this proceeding, a substantial majority of which was opposed to ten-digit dialing. Of the cards, letters, petitions, and electronic mail messages received in this docket, over 90 percent were opposed to ten-digit dialing. This does not automatically mean they favored a split; many appeared to be willing to consider service-specific overlays or other options that might have preserved 7-digit local dialing for most calls. However, those options are inconsistent with the federal guidelines and are therefore not available to the Board, so those who are opposed to 10-digit dialing are effectively in favor of a split.

C. Alternative B, The North-South Split

This is the other two-way split alternative, which would divide the 515 area code into north and south areas along a line running between Ames and Des Moines. The most important difference between this and the other two-way split is the treatment of Ames and Des Moines; while this option would place the two cities in different area codes, the other alternative would put them in the same area code.

The record with respect to this issue is mixed. In the industry comments, AT&T expressed support for Alternative A because it would keep Ames and Des Moines together, while GTE preferred Alternative B because it would separate two potential growth centers. Consumer Advocate's witness testified that, given the split in the industry opinion, the Board should seek comments from as many different Ames representatives as possible. (Tr. 283). However, public comments from Ames were also divided; many commercial customers preferred to have a different area code from Des Moines, but Iowa State University expressed strong support for

staying in the same area code as Des Moines if a split were implemented. The comments received at the Ames public comment proceeding on December 17, 1999, did not address this specific question.

While this is a very close question, the Board has decided that Ames and Des Moines should continue to share the same area code, not only because of the comments from Iowa State University and others, but also because the Iowa Department of Transportation, an important division of state government, is in Ames. (Tr. 282). Consumer Advocate was not aware of any instance in which major state offices were split by area code relief (id.), so the Board cannot look to other states to determine whether there are any special or unusual problems that might be caused by splitting state offices. Under the circumstances, and particularly in light of the Board's desire to accelerate the implementation dates in this docket (discussed below), the Board believes it would be unwise to experiment with a state government split at this time.

One other significant difference between Alternatives A and B is the effect of each alternative on EAS routes. Alternative A would divide 14 existing U S West local calling areas, while Alternative B would divide only 6, an advantage to Alternative B. However, the Board finds this is insufficient to overcome the advantage of Alternative A in keeping Des Moines and Ames in the same area code, as described above.

IMPLEMENTATION DATES

In the NANPA petition, the Iowa telecommunications industry offered a consensus recommendation for implementing an overlay in the 515 area code⁴, with permissive dialing beginning on June 1, 2000, and mandatory dialing on November 1, 2000⁵. NANPA stated that "[a]dhering to the proposed timeframe will avoid the denial or delay of service to telecommunications providers' customers due to the unavailability of CO Codes." (Tr. 16). However, the industry's recommendation and the NANPA statement were both made before December 1, 1999, when the 515 area code entered jeopardy status as the result of an unexpected request for 58 central office codes in the 515 area code. (Tr. 40).

Jeopardy status is the NANPA designation for an area code that does not have enough available central office codes to last until area code relief is implemented, based upon forecasted demand. (Tr. 41). When jeopardy is declared, central office codes are allocated by a rationing system; only a certain, limited number of central office codes will be assigned each month, even if the carriers request more. (Tr. 43). At the time of the hearing in this matter, the 515 area code had only 76 available central office codes, an insufficient number to last until November 1, 2000, the industry-recommended mandatory relief date. (Tr. 40). This situation argues strongly in favor of accelerating the implementation dates, and some

⁴ The industry recommendation only addresses implementation of an overlay (Tr. 107), but U S West states that the split implementation dates should be roughly parallel, perhaps with an earlier date for permissive dialing. (Tr. 315.)

states have done so in response to a jeopardy situation. (Tr. 77). Even U S West agreed that the declaration of jeopardy status makes it “especially important” that the Board not delay a decision regarding area code relief. (Tr. 315).

At the same time, the Board is mindful that there are many benefits to an adequate implementation period, one that will allow development of high-quality customer education programs and a sufficient permissive dialing interval to minimize post-relief customer complaints. (Id). Consumer Advocate’s witness recommended a minimum of six months between the permissive and mandatory dialing dates, in order to allow alarm system companies and cellular customers adequate time to re-program equipment, if necessary. (Tr. 213). However, no alarm system companies or cellular service providers chose to participate in this proceeding, so the Board has no first-hand information in this record regarding the possible impacts of shortening the implementation schedule.

The Board finds that, due to the unexpected occurrence of jeopardy, continued adherence to the industry-recommended implementation dates may not allow the Board to “avoid the denial or delay of service due to the unavailability of CO Codes.” The jeopardy situation adds urgency to the Board action in this docket. At the same time, the Board is very interested in allowing sufficient time for the development of high-quality customer education programs, in order to minimize the consumer costs associated with this change. Accordingly, the Board will not change

⁵ A “permissive dialing” period is a time during which calls can be made using either the old dialing system (7 or 10 digits for local calls, for an overlay), while “mandatory dialing” requires that all calls be dialed using the new system (10 digit dialing for an overlay, the new area code for a split).

the industry's recommendation that permissive dialing commence on June 1, 2000, but the Board intends to accelerate the mandatory implementation date to September 1, 2000. Because the record on this issue is not as complete as the Board would like, the Board will specifically invite comment from the parties regarding this date and will reconsider the mandatory implementation date if the comments strongly support a change.

ASSIGNING THE NEW AREA CODE

The next question the Board must decide is where to assign the new area code and the 515 area code after the split. The record on this question is unanimous: The 515 area code number should be assigned to the area identified as Area A on Attachment A. (Tr. 211, 286, 310). Area A includes Des Moines and Ames, the major centers of commercial and government activity in the existing 515 area code. Assigning the 515 area code to Area A will therefore minimize the total cost to society associated with area code relief. (Tr. 211, 282).

Area B will receive the new area code. It is the Board's understanding that the new number will be assigned by NANPA shortly after issuance of this order.

CUSTOMER EDUCATION

U S West testifies that the standard procedure in other states, when area code relief is being implemented, calls for the establishment of an industry customer education committee to develop customer education materials and media advertising that will be available to all service providers. (Tr. 313). U S West advocates that

approach in Iowa and encourages the participation of Board staff and Consumer Advocate as members of the committee. (Id). Finally, U S West recommends the Board require all industry members share the costs of customer education on a pro rata basis, based upon the number of central office codes assigned to each service provider as of a specific date. (Id).

U S West also suggests the committee could develop materials such as letters, bill inserts, and advertising materials to educate the public regarding the upcoming change. Examples of these materials, as used in other states, were attached to U S West's comments in this proceeding. (Tr. 382). U S West also suggests it may be appropriate for volunteer teams to travel to schools and senior facilities to explain the changes.

The Board agrees that a customer education committee should be created to develop and, where appropriate, coordinate the customer education efforts associated with the split. The committee should include all interested telecommunications industry representatives, along with representatives of the Board's staff and Consumer Advocate. The Board will not specifically review or approve the actions of the committee, but the Board will monitor the committee's progress by requiring periodic reports to be filed in this docket. The first such report shall be filed no later than 20 days after issuance of this order, following a meeting to be held within 15 days of the date of this order. The Board will provide further direction to the committee only if the reports indicate that further direction is required.

The Board will not decide, in this order, the appropriate mechanism for sharing among the industry members the costs of customer education. Only one proposal has been made to the Board at this time, with little or no opportunity for other interested persons to comment on that proposal. Instead, the Board will allow the committee to develop its own cost-sharing mechanism, subject only to the requirement that all industry members should expect to contribute to the cost on an equitable basis.

Moreover, if the committee is unable to achieve consensus on cost issues, or on any issues that may arise with respect to customer education efforts, the Board stands ready to resolve those issues in an expedited proceeding, upon request.

NUMBER CONSERVATION

Consumer Advocate urges the Board to consider implementing various number conservation measures as a part of this docket. Such measures include sequential number assignment, thousands block number pooling, rate center consolidation, and other steps. In its initial comments, Consumer Advocate urges action in this docket primarily out of a concern that, if steps are not taken now, they may be delayed until it is time to address another number exhaustion situation. (Tr. 118.) In its reply comments and its testimony at the December 14, 1999, proceeding, Consumer Advocate recognizes the need for prompt area code relief in this docket, but reiterates its earlier recommendation that Iowa take steps now to avoid a succession of area code relief proceedings. (Tr. 195, 257).

U S West suggests that the Board's final order in this docket should either open a separate docket to consider number conservation or establish a separate, joint task force to look at the facts and circumstances surrounding number conservation measures. (Tr. 321). In this way, the Board could consider number conservation issues on a statewide basis, rather than separately in each area code. (Id.).

The Board agrees that number conservation is an important issue that should not be delayed, but it is a statewide issue, not unique to the 515 area code. As such, it is not appropriate for consideration in this docket, which is limited to the 515 area code. Instead, the Board intends to initiate a new docket to investigate and implement number conservation measures throughout the state, just as soon as the FCC has ruled on the Board's pending request for delegation of authority.

ORDERING CLAUSES

IT IS THEREFORE ORDERED:

1. A geographic split, as shown on Attachment A to this order (and incorporated herein by this reference), is hereby approved to provide relief from the imminent exhaustion of central office codes in the 515 area code. The area designated Area A on Attachment A shall retain the 515 area code and Area B shall receive the new area code.
2. The permissive dialing period shall begin on June 1, 2000, and the mandatory dialing period shall begin on September 1, 2000.

3. A customer education committee shall be created to develop and, where appropriate, coordinate the customer education efforts associated with the split. The committee shall include all interested telecommunications industry representatives, along with representatives of the Board's staff and Consumer Advocate. The first meeting of the committee shall take place within 15 days of the date of this order. After each meeting, the committee shall file a progress report in this docket for the Board's consideration. The first such report shall be filed no later than 20 days after issuance of this order.

4. Any interested person may request reconsideration of any part of this order by filing such a request within 20 days of the date of this order. The Board is particularly interested in such requests as they may relate to the accelerated mandatory dialing date specified in Ordering Clause No. 2, above.

UTILITIES BOARD

/s/ Allan T. Thoms

/s/ Susan J. Frye

ATTEST:

/s/ Judi K. Cooper
Executive Secretary, Deputy

/s/ Diane Munns

Dated at Des Moines, Iowa, this 24th day of February, 2000.

**NPA 515 Rate Center Map
Alternative # 4
Geographic Split**

LOCKHEED MARTIN

